KING & SPALDING LLP 1185 Avenue of the Americas

New York, New York 10036 Telephone: (212) 556-2100

Facsimile: (212) 556-2222

Arthur Steinberg Scott Davidson

KIRKLAND & ELLIS LLP

300 North LaSalle Chicago, IL 60654

Telephone: (312) 862-2000 Facsimile: (312) 862-2200

Richard C. Godfrey, P.C. (admitted *pro hac vice*) Andrew B. Bloomer, P.C. (admitted *pro hac vice*)

Attorneys for General Motors LLC

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11

MOTORS LIQUIDATION COMPANY, et al., : Case No.: 09-50026 (REG)

f/k/a General Motors Corp., et al.

:

Debtors. : (Jointly Administered)

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NOTICE OF FILING OF NINTH SUPPLEMENT TO SCHEDULE "1" TO THE MOTION OF GENERAL MOTORS LLC PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE THE COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION

PLEASE TAKE NOTICE that on October 6, 2014, General Motors LLC filed the attached Ninth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction with the United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York October 6, 2014

Respectfully submitted,

/s/ Scott I. Davidson
Arthur Steinberg
Scott Davidson
KING & SPALDING LLP
1185 Avenue of the Americas
New York, New York 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222

Richard C. Godfrey, P.C. (admitted *pro hac vice*) Andrew B. Bloomer, P.C. (admitted *pro hac vice*) KIRKLAND & ELLIS LLP 300 North LaSalle Chicago, IL 60654

Telephone: (312) 862-2000 Facsimile: (312) 862-2200

Attorneys for General Motors LLC

NINTH SUPPLEMENT¹ TO SCHEDULE "1"

CHART OF ADDITIONAL IGNITION SWITCH ACTIONS COMMENCED AGAINST NEW GM NOT LISTED IN THE PREVIOUS SUPPLEMENTS TO SCHEDULE "1" TO MOTION TO ENFORCE

	<u>Name</u>	Class Models	Plaintiffs' Model	Court	Filing Date
1	Ross (Class Action) ²	Various models from 2005 to 2011	2005 Chevy Cobalt	Eastern District of New York 14-cv-03670	6/10/14
2	Belt ³	N/A	2007 Chevy HHR	Circuit Court of McDowell County, West Virginia 14-C-97 ⁴	9/4/14
3	Bloom ⁵	N/A	2008 Chevy Cobalt	Court of Common Pleas, Luzerne County, Pa. 2014-10215-0 ⁶	9/5/14

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This schedule supplements the previous supplements and the original Schedule "1" previously filed with the Court in connection with the *Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction* on April 21, 2014 [Dkt. No. 12620]. *See* Dkt. Nos. 12620-1, 12672, 12698, 12719, 12722, 12780, 12818, 12843, 12906.

A copy of the complaint filed in the Ross Action is attached hereto as Exhibit "A." While the complaint in the Ross Action references a post-363 Sale accident, it does not appear from a review of the causes of action contained in the complaint (except, possibly, the Tenth Cause of Action) that the Plaintiff is asserting claims based on the accident and any injuries arising therefrom. The complaint seeks injunctive relief and economic loss damages.

A copy of the complaint filed in the Belt Action is attached hereto as Exhibit "B." In addition to allegations regarding a defective ignition switch, the complaint in the Belt Action also references alleged problems with "the sunroof leaking, vehicle paint failure . . . and power steering failure" Belt Compl., ¶ 10. Accordingly, New GM is also filing simultaneously herewith supplemental schedules in connection with its Monetary Relief Motion to Enforce to address those allegations.

The Belt Action was removed by New GM to the United States District Court for the Southern District of West Virginia (No.: 1:14-cv-26520) on October 3, 2014.

A copy of the complaint filed in the Bloom Action is attached hereto as Exhibit "C."

The Bloom Action was removed by New GM to the United States District Court for the Middle District of Pennsylvania (No. 3:14-cv-01903) on September 30, 2014.

4	Bledsoe (Class Action) ⁷	Not specifically identified.	2008 Chevy Cobalt 2006 Chevy Trailblazer	Southern District of New York 14-cv-7631	9/19/14
			2006 Chevy Cobalt		
			2005 Chevy Cobalt		
			2006 Pontiac G6		
			2000 Chevy Impala		
			2006 Chevy Impala		
			2007 Chevy HHR		
			2007 Chevy Impala		

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A copy of the complaint filed in the Bledsoe Action is attached hereto as Exhibit "D." In addition to allegations concerning vehicles with defective ignition switches, the complaint in the Bledsoe Action also contains allegations concerning (i) vehicles with other alleged defects, and (ii) personal injuries allegedly arising from pre-363 Sale accidents. Accordingly, New GM is also filing simultaneously herewith supplemental schedules in connection with its Monetary Relief Motion to Enforce and Pre-Closing Accident Motion to Enforce to address those allegations.